

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MIDWEST ATHLETICS AND SPORTS
ALLIANCE LLC,

Plaintiff,

v.

RICOH USA, INC.,

Defendant.

Civil Action No.:

2:19-cv-00514-JDW

**PLAINTIFF MIDWEST ATHLETICS AND SPORTS ALLIANCE LLC’S
MOTION FOR LEAVE TO SEAL DOCUMENTS**

Pursuant to Local Civil Rule 5.1.5 and the Stipulated Protective Order in this case (D.I. 91), Plaintiff Midwest Athletics and Sports Alliance LLC (“MASA”) hereby submits this motion seeking an order sealing redacted portions of MASA’s and Ricoh’s Joint Discovery Dispute Letter of May 22, 2020 (“the Letter”) (D.I. 166) and certain corresponding exhibits (Exhibits A, D, and E) (D.I. 166-1, 166-4, and 166-5), which contain highly-confidential business information and information that is subject to confidentiality obligations, such as references to and identification of MASA’s confidential funder and terms of MASA’s confidential Patent Purchase Agreement with non-party Kodak Company. In an effort to narrow the amount of information precluded from public disclosure, MASA requests limited redactions of the highly-confidential and sensitive business and financial information in the Letter, and requests that Exhibits A, D, and E to the Letter be sealed in their entirety.

MASA submits its proposed redactions as Exhibits 1, 2, 3, and 4 to the Declaration of Cristina Martinez filed in support of this Motion.

In support of the Motion, MASA relies on the Memorandum of Law and Declaration of Cristina Martinez and exhibits thereto, submitted herewith.

Respectfully submitted,

Dated: July 30, 2020

By: /s/ Cristina Martinez

**KRAMER LEVIN NAFTALIS
& FRANKEL LLP**

Paul J. Andre
Lisa Kobialka (admitted *pro hac vice*)
990 Marsh Road
Menlo Park, CA 94025
Telephone: (650) 752-1700
Facsimile: (650) 752-1800
pandre@kramerlevin.com
lkobialka@kramerlevin.com

Mark A. Baghdassarian (admitted *pro hac vice*)
Cristina Martinez (admitted *pro hac vice*)
1177 Avenue of the Americas
New York, NY 10001
Tel: 212.715.9100
Fax: 212.715.8000
mbaghdassarian@kramerlevin.com
cmartinez@kramerlevin.com

BAZELON LESS FELDMAN PC

Richard L. Bazelon
Lisa A. Barton
One South Broad Street, Suite 1500
Philadelphia, PA 19107
Telephone: (215) 568-1155
Facsimile: (215) 568-9319
rbazelon@bazless.com
lbarton@bazless.com

*Attorneys for Plaintiff Midwest Athletics and
Sports Alliance LLC*

CERTIFICATE OF SERVICE

I, Cristina Martinez, hereby certify that on July 30, 2020, I caused the foregoing Motion for Leave to Seal Documents to be served via CM/ECF, with copies of the materials sought to be sealed served via e-mail, on the following counsel:

BLANK ROME LLP

Evan H. Lechtman
One Logan Square
Philadelphia, PA 19103-6998
Tel: (215) 569-5367
Fax: (215) 832-5367
Lechtman@blankrome.com

JONES DAY

Geoffrey K. Gavin (admitted *pro hac vice*)
Ryan K. Walsh (admitted *pro hac vice*)
1420 Peachtree Street, N.E., Suite 800
Atlanta, GA 30309-3053
Tel: (404) 581-8646
Fax: (404) 581-8330
ggavin@jonesday.com
rwalsh@jonesday.com

Tracy A. Stitt (admitted *pro hac vice*)
51 Louisiana Avenue N.W.
Washington, D.C. 20001
Tel: (202) 879-3939
Fax: (202) 626-1700
tastitt@jonesday.com

Joshua Nightingale (admitted *pro hac vice*)
500 Grand Street, Suite 4500
Pittsburg, PA 15219-2514
Tel: (412) 391-3939
Fax: (412) 394-7579
jrnightingale@jonesday.com

By: /s/ Cristina Martinez
Cristina Martinez